

**MEMO ENDORSED**

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Hon. Valerie E. Caproni  
 United States District Court  
 Southern District of New York  
 Thurgood Marshall United States Courthouse  
 40 Foley Square  
 New York, NY 10007

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**Re: *Berkshire Hathaway Specialty Insurance Company v. London, et al.*;  
 Case No. 22-CV-3798 (VEC), Request for Adjournment**

Dear Judge Caproni:

Bryan Cave Leighton Paisner LLP represents defendants QBE Insurance Corporation, sued under the trade name of QBE North America, Karen London, Morgan Wichmann, and Craig Freid (collectively "Defendants") in the above-referenced matter. We write on behalf of all parties, pursuant to section 2.C of the Court's Individual Practice Rules in Civil Cases, to request an adjournment of the Initial Pretrial Conference ("IPTC") in this matter until August 11, 2022, or a date thereafter, subject to the Court's schedule, and an adjournment of the deadline to submit a joint letter and proposed Civil Case Management Plan (currently due on June 30, 2022).

The IPTC is currently scheduled for July 8, 2022 at 10:00 a.m. (ECF No. 8, Notice of Initial Pretrial Conference dated May 18, 2022.) Plaintiff Berkshire Hathaway Specialty Insurance Company ("Plaintiff") and Defendants are currently engaged in settlement discussions. The parties request an adjournment of the IPTC and corresponding deadlines to permit the parties to continue to engage in settlement negotiations and work towards a resolution of this matter without simultaneously incurring the expense and time necessary for discovery or expending further judicial resources if the matter can be resolved. This is the parties' first request for an adjournment of the IPTC and any corresponding deadlines.

We thank the Court in advance for its attention to this matter.

Respectfully submitted,  
 /s/ Courtney J. Peterson

**Courtney J. Peterson**

cc: All counsel of record (*via ECF*)

Application GRANTED. The parties' initial pre-trial conference scheduled for July 8, 2022, is hereby adjourned to **Friday, August 12, 2022 at 10:00 a.m.** in Courtroom 443 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007. The parties' joint submissions are due by no later than **August 4, 2022**. For submission requirements, please refer to docket entry 8.

SO ORDERED.

A handwritten signature in blue ink, reading "Valerie Caproni".

Date: 6/27/2022

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HON. VALERIE CAPRONI  
 UNITED STATES DISTRICT JUDGE